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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

14 THIS DOCUMENT RELATES TO: ALL
15 ACTIONS
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MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

**STIPULATION AND [PROPOSED]
ORDER STAYING ALL CLAIMS AND
PROCEEDINGS AGAINST DISCORD
INC. AND ROBLOX CORPORATION**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Personal Injury Plaintiffs in the cases below, School District and Local Government Plaintiffs in the cases below, Discord Inc. (“Discord”), and Roblox Corporation (“Roblox”), through their undersigned counsel, hereby stipulate and respectfully request that the Court enter the proposed order staying all claims and proceedings against Discord and/or Roblox in the cases listed below and in any future cases that may be filed by undersigned Plaintiffs’ counsel against Discord and/or Roblox in these proceedings or that are transferred to these proceedings.

Case	SFC Filing Date	Discord and/or Roblox
<i>C.U. v. Snap Inc.</i> , 4:22-cv-07347 (N.D. Cal.)	April 3, 2023	Discord and Roblox
<i>Guillot v. Meta Platforms, Inc.</i> , 4:23-cv-03453 (N.D. Cal.)	July 11, 2023	Discord and Roblox
<i>Broward County School Board v. Meta Platforms, Inc.</i> , 4:23-cv-01061 (N.D. Cal.)	March 14, 2024	Discord
<i>Bucks County et al v. Meta Platforms, Inc.</i> , 4:23-cv-01149 (N.D. Cal.)	March 14, 2024	Discord
<i>Carroll v. TikTok Inc.</i> , 4:23-cv-02089 (N.D. Cal.)	March 14, 2024	Discord
<i>Miami-Dade County Public Schools District v. Meta Platforms, Inc.</i> , 4:23-cv-05257 (N.D. Cal.)	March 14, 2024	Discord
<i>S.L. v. Snap Inc.</i> , 4:24-cv-01868 (N.D. Cal.)	March 26, 2024	Discord
<i>County of Oakland, Michigan v. Meta Platforms Inc.</i> , 4:24-cv-02554 (N.D. Cal.)	April 29, 2024	Discord
<i>M.S. v. Google LLC</i> , 4:24-cv-03646 (N.D. Cal.)	June 17, 2024	Discord and Roblox
<i>K.G. and N.F. v. Snap Inc.</i> , 4:24-cv-04086 (N.D. Cal.)	July 5, 2024	Discord and Roblox

Neither Discord nor Roblox have been named in any Master Complaint, participated in briefing of any of the motions to dismiss any Master Complaint, or participated in discovery in these proceedings to date. Additionally, none of the above-referenced cases have been selected as bellwether cases in these proceedings. *See* Dkt. 1023. Accordingly, the requested stay will further the interests of judicial economy and efficiency.

This stipulation and requested stay are without prejudice to the right of any parties in any bellwether cases to seek third-party discovery from Discord or Roblox in connection with the bellwether plaintiffs’ use of their services. This stipulation is further without prejudice to any

1 Discord or Roblox objections or requests for relief related to any discovery that may be sought
2 from Discord or Roblox in such proceedings.

3 This stipulation is further without prejudice to Discord or Roblox moving to sever the
4 claims against one or both of them in any cases brought against them in these proceedings or
5 Plaintiffs' right to oppose such motion.

6 This stipulation is further without prejudice to Discord, Roblox or undersigned counsel for
7 the Plaintiffs requesting that the stay herein be lifted, in full or in part, should circumstances
8 require.

9 THEREFORE, Personal Injury Plaintiffs and School District and Local Government
10 Plaintiffs in the cases above, Discord, and Roblox, through their undersigned counsel, stipulate
11 and respectfully request that the Court stay all claims and proceedings against Discord and/or
12 Roblox in the cases listed above and in any future cases filed by undersigned Plaintiffs' counsel
13 against Discord and/or Roblox in these proceedings or that are transferred to these proceedings
14 pending further order of this Court. Personal Injury Plaintiffs and School District and Local
15 Government Plaintiffs in the cases above, Discord, and Roblox, through their undersigned
16 counsel, further stipulate and respectfully request that the stay shall remain in effect until such
17 time as any one or all of the affected parties successfully petition the Court to lift the stay.
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19 **IT IS SO ORDERED.**

20 Dated: November 15, 2024
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THE HONORABLE DISTRICT JUDGE
24 YVONNE GONZALEZ ROGERS
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1 **IT IS SO STIPULATED AND AGREED.**

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3 DATED: November 15, 2024

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1 DATED: November 15, 2024

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ATTESTATION

I, Laura Marquez-Garrett, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory.

Dated: November 15, 2024

By: /s/ Laura Marquez-Garrett
Laura Marquez-Garrett